

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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JUN 25 1992

Federal Communications Commission
Office of the Secretary

In the Matter of

The Telephone Consumer
Protection Act of 1991

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CC Docket No. 92-90

REPLY COMMENTS

MCI Telecommunications Corporation (MCI) hereby replies to comments filed in response to the Commission's Notice of Proposed Rulemaking (NPRM) in the above-captioned proceeding, which seeks to implement the Telephone Consumer Protection Act of 1991 (TCPA). Most commentators support the establishment of company-specific "no call lists" to protect residential subscribers from unwanted telemarketing solicitations. The record further supports a determination that a national or regional database would be extremely costly to implement and maintain, would not significantly reduce the number of telephone solicitations received by residential customers, and could actually increase consumer confusion and frustration. Accordingly, MCI urges that the Commission adopt an approach providing for no call lists.

As an initial matter, consumers, companies and governmental agencies^{1/} agree that mechanized, autodialed telemarketing calls

^{1/} See, Comments of the Public Utility Commission of Texas, Comments of the People of the State of California and the Public Utilities Commission of the State of California, Comments of Washington State Attorney General, Comments of the State of Minnesota, Initial Comment of American Express Company, Comments of the GTE Service Corporation, Comments of Kelly A. McGinnis, MD, and Consumer Action's Opening Comments.

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that do not involve live telemarketers are most offensive to consumers. Accordingly, many privacy concerns arising from telemarketing are addressed and resolved by restrictions on the use of autodialing using artificial voice or pre-recorded messages. To the extent these restrictions are not sufficient to ensure the privacy and safety of consumers, the Commission should consider imposing additional restrictions.^{2/}

With respect to the proposed methods to protect residential telephone subscribers from objectionable telephone solicitations -- electronic databases, telephone network technologies, directory markings, company-specific no call lists, and time of day restrictions -- the record supports, as noted above, the establishment of company-specific no call lists. It overwhelmingly shows that telemarketing is a critical sales tool for many businesses, including start-up businesses and businesses trying to increase market share, because it is a cost effective way to introduce products or services to potential new customers. For example, through telemarketing, competitive telecommunications companies have been able to establish a presence in the residential long distance telephone business

^{2/} For example, the Texas PUC states that the Commission should narrowly define which businesses and organizations are exempt from the autodialer restrictions because of a "prior business relationship" with the called party. Comments of the Texas PUC at 3-4. In addition, Consumer Action states that tax exempt nonprofit organizations should not be exempt from the autodialer restrictions because consumers object to these calls regardless of the content or initiator of the message. Consumer Action's Opening Comments at 4-5.

which, not too long ago, was 100% "owned" by the monopoly provider of service. In addition, the newspaper industry indicates that it receives new customers primarily through telemarketing, and one-person sales operations, such as those representing Amway and Avon, also rely on telemarketing for business. Moreover, the amount of revenues generated through telemarketing - \$435 billion in 1990 - demonstrates that many residential subscribers do not object to all telemarketing. In fact, many benefit from telemarketing as a result of purchasing goods or services from their homes via telephone.

Thus, the Commission should adopt a requirement of company-specific no call lists because that approach adequately protects consumers from unwanted telephone solicitations, but is not so broad and overreaching as to burden legitimate business activity. The approach satisfies the objectives of the TCPA by allowing consumers to easily select by which companies they do not want to be telemarketed. Consumers thus can prevent telemarketing calls simply by notifying selected companies of their wish not to be telemarketed. However, they then could continue to receive telemarketing calls from other companies.

The company-specific no call list approach imposes insignificant additional burdens on business. Many companies engaged in telemarketing already use some form of no call list and, for these companies, there would be no additional burden.

Even for companies that do not already maintain such lists, telemarketing and customer service personnel can be trained to generate and maintain the lists at comparatively little cost.

A company-specific do not call system also would eliminate confusion and uncertainty with regard to calling to persons with whom the caller has an "established business relationship," which the TCPA exempts from the term "telephone solicitation." Under the company-specific do not call system, once a consumer requests not to be telemarketed, it can be assumed that he or she has determined that there is no business relationship or there is to be no such relationship from that time forward.

The record also demonstrates that a national or regional no call database administered by a third party actually could be less effective and efficient in protecting consumers from unwanted telemarketing calls and would impose significant burdens on businesses. As an initial matter, with a database, consumers would not be able to selectively stop telemarketing. Rather, consumers would have to stop all telemarketing (from non-exempt companies), or allow all telemarketing.^{3/} This "all-or-nothing" approach hardly would serve the best interests of consumers.

^{3/} AT&T states that it might be possible to design a database to permit consumers to exclude some companies from telemarketing, but that such a database could cost \$24 to \$80 million to establish. AT&T Comments at 12.

In addition, there likely would be a significant time lag before an individual could be added to the database. The LeJeune Associates of Florida (LeJeune), the only company that puts forth a proposal for a national database, contemplates only quarterly updates to a national database. LeJeune further states that telemarketers would need time for compliance, for example, "sixty days from the date a name is included in an update." LeJeune Comments at 25 n.46. Thus, under LeJeune's proposal it could take more than five months from the time a consumer requests not to be telemarketed before that individual's phone number is removed from telemarketing lists. Such a time lag would frustrate and annoy consumers and, ultimately, might be unacceptable. In contrast, a company can implement an individual's request to be added to a company-specific no call list in a matter of days.

Moreover, a national database could add to consumer confusion and frustration because its existence would provide to consumers a false sense of "security." Contrary to expectations, being added to the national database would not eliminate all, or even most, telemarketing calls. Consumers would still receive such calls from tax exempt nonprofit organizations and "any person with whom the caller has an established business relationship." See, 47 U.S.C. § 227(a)(3). Thus, the potential benefits of a national database are significantly reduced because of the number of companies and organizations that would be exempt

from its reach, as well as the cost of establishing such a database.

The record also demonstrates that other alternatives either are not available, or would not be effective in preventing unwanted telephone solicitations. Most commentators agree that the technology does not exist today for a network solution to prevent objectionable telephone solicitations.^{4/} In addition, special directory markings would not be effective because directories are only updated annually and there is no effective way for telemarketers to get the information.^{5/}

Finally, the record clearly demonstrates that time-of-day restrictions are not sufficient to achieve the purpose of the TCPA. Although MCI follows time-of-day restrictions to reduce consumer inconvenience, such practice does not serve to prevent unwanted telemarketing solicitations. Accordingly, this option should be used in conjunction with company-specific no call lists.

^{4/} See, Comments of Pacific Bell and Nevada Bell, Comments of The Southern New England Telephone Company, Comments of US West Communications, Inc. and Comments of the GTE Service Corporation.

^{5/} See, Comments of Pacific Bell and Nevada Bell, Comments of US West Communications, Inc. and Comments of the GTE Service Corporation.

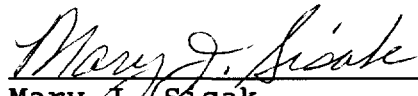
Thus, the Commission should require company-specific no call lists as the least costly, intrusive, and cumbersome mechanism to protect residential subscribers from unwanted telemarketing solicitations. However, if that does not work, the Commission could revisit this issue on request, or on its own motion.

Based on the foregoing, MCI respectfully requests that the Commission adopt the proposals stated herein and in MCI's comments.

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I, Sonya Lee, do hereby certify that on this 25th day of June, 1992, copies of the foregoing "**Reply Comments**" in CC Docket No. 92-90 were served by first-class mail, postage prepaid, unless otherwise indicated, upon the parties on the attached list.


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